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Attorneys for Plaintiff,
RICK ABELSON

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RICK ABELSON, an individual,) **Civil Case No. 2:19-cv-1097**
Plaintiff,)
v.) **COMPLAINT FOR COPYRIGHT
INFRINGEMENT**
CLP DCP, LLC, also known as)
DA CAPO PRESS, L.L.C., a) **DEMAND FOR JURY TRIAL**
New York Limited Liability)
Company; HACHETTE BOOK)
GROUP, INC., a Delaware)
Corporation; Joel Selvin, an)
individual; and Pamela Turley,)
an individual,)
Defendants.)

Plaintiff RICK ABELSON, by and through his counsel, alleges for his complaint against defendants CLP DCP, LLC aka DA CAPO PRESS, L.L.C., HACHETTE BOOK GROUP, INC., Joel Selvin, and Pamela Turley as follows:

NATURE OF THE ACTION

1. This Court has subject matter jurisdiction pursuant to 17 U.S.C. § 501, *et seq.* (copyright infringement) and 28 U.S.C. §§ 1331 (federal question jurisdiction), 1338(a) and 1338(b).

THE PARTIES

2. Plaintiff Rick Abelson is an individual residing in Redondo Beach, California.

3. On information and belief, defendant CLP DCP, LLC also or formerly known as Da Capo Press, L.L.C. is a limited liability company organized under the laws of the State of New York.

4. On information and belief, defendant Hachette Book Group, Inc. is a corporation organized under the laws of the State of Delaware.

5. On information and belief, defendant Pamela Turley is an individual residing in Atlanta, Georgia.

6. On information and belief, defendant Joel Selvin is an individual residing in San Francisco, California.

7. On information and belief, at least one of the defendants exercised agency and/or control over the activities of the one or more of the other defendants, including the infringement of plaintiff's copyrights, such that each defendant is liable to plaintiff.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this lawsuit under 28 U.S.C. § 1338, because, *inter alia*, the action arises under the copyright laws of the United States.

9. This Court has personal jurisdiction over defendant Joel Selvin because he resides in California. Also, on information and belief, all defendants

1 have transacted business in the Central District of California. Further, on
2 information and belief, the defendants systematically and continuously direct
3 business activities toward and into the Central District of California, including
4 selling the infringing book in the district.

5 10. Venue is proper and reasonable in this district under 28 U.S.C. §
6 1391(b)(2) because a substantial part of the events or omissions giving rise to
7 these claims for copyright infringement occurred in this district and defendants
8 have significant contacts with the district.

FACTS

11 11. Plaintiff Rick Abelson is an urban planner with over 30 years of
12 professional experience in the private sector designing significant cultural
13 attractions throughout the world and the author of at least four copyrighted works
14 relating to the famous band named The Grateful Dead. The works comprise,
15 among other things, two images and one body of text. A true and correct copy of
16 excerpts from Mr. Abelson's copyrighted works are attached hereto as Exhibit A.

17 12. Mr. Abelson's works are the subject of U.S. Copyright Registration
18 Nos. VAu 000373848, VAu 000435156, VA 000807684 and VAu 000431021.
19 True and correct copies of Mr. Abelson's copyright registrations are attached
20 hereto as Exhibit B.

13. Mr. Abelson uses the copyright symbol, ©, on his copyrighted works.

22 14. Joel Selvin and Pamela Turley are the authors of a book entitled:
23 *Fare Thee Well: The Final Chapter of the Grateful Dead's Long, Strange Trip*
24 ISBN-13: 978-0306903052. (the “Infringing Book”). The Infringing Book has
25 retail price of approximately \$29.95.

26 15. The Infringing Book is a biography about The Grateful Dead and the
27 years following the death of their lead member, Jerry Garcia, in 1995. True and
28 correct copies of excerpts from the Infringing Book are attached hereto as Exhibit

1 C. The excerpts in Exhibit C are unauthorized and infringing copies of Mr.
 2 Abelson's copyrighted works.

3 16. On October 9, 2017, defendant Joel Selvin emailed Mr. Abelson
 4 seeking permission to use Mr. Abelson's works in his book. A true and correct
 5 copy of his email to Mr. Abelson is attached hereto as Exhibit D. Selvin
 6 requested permission from Mr. Abelson to use Mr. Abelson's copyrighted works.
 7 Selvin was aware that he did not have copyright rights or authorization to use Mr.
 8 Abelson's works.

9 17. Mr. Abelson did not authorize Selvin or any of the defendants to use
 10 his copyrighted works.

11 18. Given the nature and quality of Mr. Abelson's work, he is very
 12 selective regarding the use of his works, and thus, to date, has not licensed any of
 13 his copyrighted works.

14 19. Mr. Abelson had no intention of granting a license of any kind to
 15 any of the works to any of the defendants.

16 20. The Infringing Book contains content that is objectionable to the fans
 17 of the Grateful Dead as well as several long-time photographers and journalists
 18 associated with the Grateful Dead. Due to the objectionable content, Mr.
 19 Abelson's reputation is harmed by the unauthorized use of Mr. Abelson's works
 20 in the Infringing Books and by creating a false association with the Infringing
 21 Book. Moreover, negative reviews and opinions of the book from the public,
 22 before and after mass publication, have erroneously and wrongfully been
 23 associated with Mr. Abelson.

24 21. Despite knowing they did not have Mr. Abelson's authorization,
 25 Selvin and Turley completed the Infringing Book, which copied and republished
 26 Mr. Abelson's copyrighted works on or about June 19, 2018.

27 22. Additionally, defendants intentionally made a false attribution of the
 28 works in the Infringing Book to the University of California, Berkeley.

1 23. The book was published by defendant CLP DCP, LLC also or
 2 formerly known as DA CAPO PRESS, L.L.C., which directed and profited from
 3 the unauthorized copying and infringement of Mr. Abelson's copyrighted works.

4 24. On information and belief, DA CAPO PRESS, LLC paid Selvin a
 5 \$30,000 advance for the Infringing Book.

6 25. On information and belief, Selvin paid other photographers and
 7 journalists, such as Susana Millman, for the right to use other copyrighted works
 8 and provided proper attribution for such authors.

9 26. On information and belief, HACHETTE BOOK GROUP, INC. is the
 10 parent corporation of CLP DCP, LLC aka or fka DA CAPO PRESS, L.L.C., and
 11 also directed and profited from the unauthorized copying and infringement of Mr.
 12 Abelson's copyrighted works.

13 27. Defendants' copying, republication and exploitation of Mr.
 14 Abelson's copyrighted works was without authorization from Mr. Abelson.
 15 Defendants' copying was willful, oppressive, malicious and with wrongful intent
 16 to infringe the rights of Mr. Abelson.

CLAIMS OF RELIEF

FIRST CLAIM OF RELIEF

(Copyright Infringement – 17 U.S.C. § 501, against all defendants)

21 28. Plaintiff repeats and incorporates by reference the statements and
 22 allegations in paragraphs 1 to 27 of the complaint as though fully set forth herein.

23 29. At all times relevant hereto, plaintiff has been the owner, author
 24 and/or assignee of all copyright rights or rights to assert copyright claims for his
 25 works and all derivative works.

26 30. Without authorization, defendants used, copied, reproduced, and
 27 republished the copyrighted material. Defendants' copying, reproduction, and
 28 republication were commercial in character and purpose. Defendants either

1 completely or substantially used plaintiff's copyrighted content. Because the
2 copying was for commercial purposes, it did not constitute fair use under any
3 doctrine of copyright law.

4 31. Plaintiff did not authorize defendants' copying, displaying, or
5 republishing of the works. Defendants infringed the copyrights of plaintiff's
6 creative works by, *inter alia*, reproducing, republishing, publicly displaying, and
7 creating derivates of the works.

8 32. As a result of defendants' infringement, plaintiff has suffered, and
9 will continue to suffer, substantial losses.

10 33. Defendants knew the infringed works belonged to plaintiff and that
11 they did not have authorization to exploit plaintiff's works. Defendants'
12 infringements were, therefore, willful.

13 34. On information and belief, defendants induced, caused and materially
14 contributed to the infringing acts of others by encouraging, inducing, allowing,
15 and assisting others to reproduce and republish plaintiff's works. Further, on
16 information and belief, defendants had knowledge of the infringing acts of others
17 relating to plaintiff's copyrighted works.

18 35. On information and belief, defendants have the right and ability to
19 control the infringing acts of the individuals and entities that directly infringed
20 plaintiff's works. Further, on information and belief, defendants obtained a direct
21 financial benefit from the infringing activities of the individuals or entities that
22 directly infringed plaintiff's works.

23 36. Defendants' actions, as set forth above, constitute copyright
24 infringement in violation of the Copyright Act, 17 U.S.C. § 501, *et seq.*, all to the
25 damage of plaintiff as previously alleged.

26 37. By reason of the foregoing unlawful acts recited in the above
27 paragraphs, plaintiff has been irreparably harmed and will continue to suffer
28 damage until an appropriate injunction and damages award are imposed by this

1 Court against defendants.

2

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff asks that this Court grant judgment against
5 defendants for the following:

- 6 A. Defendants, their officers, agents, servants, employees, and attorneys,
7 and all persons in active concert or participation with any of them, be
8 permanently enjoined from:
- 9 i. infringing plaintiff's copyrighted works;
- 10 ii. indirectly, contributorily, or vicariously infringing plaintiff's
11 copyrighted works; and,
- 12 iii. conspiring, encouraging, inducing, allowing, abetting, or assisting
13 others in performing any of the activities referred to in
14 subparagraphs (i) - (ii) above.
- 15 B. Defendants shall file with the Court and serve on plaintiff, within 30
16 days after the entry and service on defendants of an injunction, a report in
17 writing and attested to under penalty of perjury setting forth in detail the
18 manner and form in which defendants has complied with the provisions of
19 subparagraph (A) above.
- 20 C. Plaintiff be awarded statutory damages for prosecuting this action.
- 21 D. Plaintiff recovers all damages he has sustained as a result of
22 defendants' infringement.
- 23 E. Plaintiff be awarded enhanced damages due to defendants' willful
24 infringement.
- 25 F. Plaintiff be awarded his reasonable attorneys' fees for prosecuting
26 this action to the full extent allowable by 17 U.S.C. § 505, or other related
27 statute.
- 28 G. Plaintiff recovers his costs of this action and pre-judgment and post-

1 judgment interest, to the full extent allowed by law.

2 H. Plaintiff receives all other relief the Court deems appropriate.

3

4 **DEMAND FOR JURY TRIAL**

5 Plaintiff hereby demands a trial by the jury on his claims herein and all
6 issues and claims so triable in this action.

7

8 Respectfully submitted,

9 Date: February 13, 2019 MANDOUR & ASSOCIATES, APC

10

11 /s/ Ben T. Lila

12 Ben T. Lila (SBN 246808)
13 Email: blila@mandourlaw.com
14 Attorneys for plaintiff,
RICK ABELSON

EXHIBIT A

EXHIBIT A

TERRAPIN STATION

Building Facade - Arrival / Entry



In keeping with the overall goal for visitors to experience what it is like at a Grateful Dead concert, the building itself will resemble an actual stage set similar to many of the Grateful Dead's outdoor concerts. The famous 1974 Wall of Sound configuration of speakers, monitors, scaffolding and light rigging will function as the point of arrival. A box office set under the round speaker bank will be for advance ticket sales and information. This unusual building will become an exciting way to step into the world of the Grateful Dead.



16

Grateful Dead Mercantile Company

The Grateful Dead Mercantile Company will be the primary retail store within Terrapin Station. Together with the MNS Record Store, the combined floor plans will be very flexible in layout. In their most optimum configuration, the combined stores would wrap around a corner site near the main entrance to Terrapin Station.

This arrangement is very desirable, making it possible to capture sales revenue from those who do not have the time to visit or do not wish to pay admission to enter the Terrapin Station main attraction. Similarly, access from the outside will make it more convenient to operate the stores prior to opening and after closing of the Terrapin Station main venue.

The Grateful Dead Mercantile Company will sell four kinds of retail merchandise:

1. General Lifestyle
Grateful Dead branded products.
2. Limited Editions/Collectibles
Authentic Grateful Dead memorabilia.
3. Terrapin Station Exclusives
New products available only at TS.
4. Other Related Music Products
With whom Terrapin Station will have licensing agreements.



19

EXHIBIT A

TERRAPIN STATION

In addition, employment opportunities for staff members of the Grateful Dead, such as docents and paid administrators of the facility will be necessary.

Initial capital costs to design and construct **Terrapin Station** will be accomplished through financial negotiations with selected investors participating with the Grateful Dead. Capital and annual operating expenses will be ameliorated by limited sponsorship and endorsements sanctioned by the Band. Annual operating revenue will also be generated from paid admissions, the Mercantile Store sales of existing catalog items and exhibit momentos offered at the facility through Grateful Dead Merchandising and a specially themed cafe serving light foods and natural juices.

Imagine giving young music fans, as well as long-time Deadheads, the opportunity to "touch the Grateful Dead," to pass through the rich history of the music and its tangents by presenting a fascinating and incisive panorama of the Grateful Dead with the use of authentic memorabilia and state-of-the-art media.

It will be a mystical place to invigorate the senses. Something to capture the tried and true, as well as the curious imagination. **Terrapin Station** will be the most unique educational and spiritual music attraction ever assemble in America.



EXHIBIT B

EXHIBIT B

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

FORM VA
UNITED STATES COPYRIGHT OFFICE

VA 807-684



EFFECTIVE DATE OF REGISTRATION

August 6 1996

Month Day Year

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

TERAPIN STATION

PREVIOUS OR ALTERNATIVE TITLES ▼

THE GRATEFUL DEAD EXPERIENCE

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

N/A

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼ RICK ABELSON, WHOSE PSEUDONYM IS
LET IT SHINE PRODUCTIONS

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

1960

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
Citizen of ▶ USA
OR Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

TEXT AND ANYWORK

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

NAME OF AUTHOR ▼

N/A

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
Citizen of ▶
OR Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

N/A

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
Citizen of ▶
OR Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

082131430



Please use space for dates of birth and death blank.

See instructions before completing this space.

3
4

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases. DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Complete this information ONLY if this work has been published. Month ▶ JUNE Day ▶ 8 Year ▶ 1996 Nation ▶

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.▼

RICK ABELSON
106 SOUTH GUADALUPE AVENUE 'B'
REDONDO BEACH, CALIFORNIA 90277

APPLICATION RECEIVED
AUG. 06.1996

ONE DEPOSIT RECEIVED
AUG. 06.1996

TWO DEPOSITS RECEIVED

DO NOT WRITE HERE
OFFICE USE ONLY
REMITTANCE NUMBER AND DATE

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.▼

MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
• See detailed instructions.
• Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of 2 pages

EXHIBIT B

EXAMINED BY *J.R.H.* FORM VA

CHECKED BY _____

CORRESPONDENCE FOR
Yes COPYRIGHT
 DEPOSIT ACCOUNT OFFICE
FUND'S USED USE ONLY

*Added by C.O. Authority phone conversation with Rick Abelson, 12/31/96.

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

This is the first published edition of a work previously registered in unpublished form.

This is the first application submitted by this author as copyright claimant.

This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

REGISTRATION IS PENDING (SUBMITTED 7/23/96)

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

*(Some artwork and photos taken from preexisting sources.)
REGISTRATION PENDING FOR THE GRATEFUL DEAD EXPERIENCE
(new design, text and artwork)*

6

See instructions
before completing
this space.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

REVISED AND ADDITIONAL NEW TEXT AND ARTWORK

7

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼ Account Number ▼

CORRESPONDENCE Give name and address to whom correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

RICK ABELSON

*106 SOUTH GUADALUPE AVENUE 'B'
REDONDO BEACH, CALIFORNIA 90277*

Be sure to
give your
daytime phone
number

Area Code & Telephone Number ▶ 310 · 379 · 1894

8

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ▼

author

other copyright claimant

owner of exclusive right(s)

authorized agent of

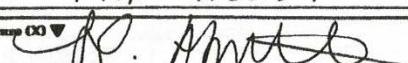
Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made
by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this is a published work, this date must be the same as or later than the date of publication given in space 3.

RICK ABELSON

date ▶ *01/1996*


Handwritten signature CO ▼

9

MAIL
CERTIFI-
CATE TO

Certificate
will be
mailed in
window
envelope

Name ▼	RICK ABELSON
Number/Street/Apartment Number ▼	106 South Guadalupe Avenue 'B'
City/State/ZIP ▼	Redondo Beach, CA 90277

Have you:
• Completed all necessary
spans?
• Signed your application in space
8?
• Enclosed check or money order
for \$10 payable to Register of
Copyrights?
• Enclosed your deposit material
with the application and fee?
MAIL TO: Register of Copyrights,
Library of Congress, Washington,
D.C. 20559

* 17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

*U.S. GOVERNMENT PRINTING OFFICE: 1987: 161-53140,018

February 1987—100,000

EXHIBIT B

Additional Certificate of Registration of a Claim to Copyright

This is to certify that the statements set forth
in the attached have been made a part of the
records of the Copyright Office with claim
of copyright registered under number

In testimony whereof, the seal of this office
is affixed hereto on



VAu 435-156

October 25, 2018

A handwritten signature in black ink that reads "Kay A. Lewis".

Acting United States Register of Copyrights and Director

FORM VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

Rf

VAu 435-156

EFFECTIVE DATE OF REGISTRATION

1 12 98

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

TERRAPIN STATION

NATURE OF THIS WORK ▼ See instructions

BUSINESS PLAN FOR MUSEUM DESIGN.

PREVIOUS OR ALTERNATIVE TITLES ▼

THE GRATEFUL DEAD EXPERIENCE

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

N/A

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2 a NAME OF AUTHOR ▼ RICK ABELSON/ dba*
LET IT SHINE PRODUCTIONS

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

1960

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▶ Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

AS NOTED IN '66'

NOTE

Under the law,
the "author" of

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

- 3-Dimensional sculpture
- Map
- Technical drawing
- 2-Dimensional artwork
- Photograph
- Text
- Reproduction of work of art
- Jewelry design
- Architectural work
- Design on sheetlike material

097001315 *



NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▶ Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

death blank.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions
* 3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work
 Design on sheetlike material

3 a

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1997

This information must be given
◀ Year in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information Month ▶ Day ▶ Year ▶ Nation ▶
ONLY if this work has been published.

See instructions before completing this space.

4 b COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

RICK ABELSON
856 AVENUE B
REDONDO BEACH, CA 90277

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

DO NOT WRITE HERE
OFFICE USE ONLY
APPLICATION RECEIVED
JAN 12 1998
ONE DEPOSIT RECEIVED
JAN 12 1998
TWO DEPOSITS RECEIVED
JAN 12 1998
FUND RECEIVED
JAN 12 1998

MORE ON BACK ▶ * Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
* See detailed instructions.
* Sign the form at line 8.

DO NOT WRITE HERE
Page 1 of 2 pages

EXHIBIT B

EXAMINED BY URB
CHECKED BY _____

FORM VA

* Added by C.O. on authority of Rick Abelson, by telephone call on 6/10/98.

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
a. This is the first published edition of a work previously registered in unpublished form.
b. This is the first application submitted by this author as copyright claimant.
c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▶ VA 373-848 (JULY 29, 1996) + Year of Registration ▶ VA 807-684 (AUGUST 6, 1996)

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

- a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

① THE GRATEFUL DEAD EXPERIENCE
② TERRAPIN STATION - concept development + financial
overview

5

- b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

REVISED AND ADDITIONAL NEW TEXT AND 2D ARTWORK
PARENTHETICALLY SKETCHES SHOWN ON PAGES 14, 19, 24 + 28.

6

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▶ RICK ABELSON
Account Number ▶ 7

See instructions
before completing
this space.

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▶

RICK ABELSON
856 AVENUE B
REDONDO BEACH, CALIFORNIA 90277

Be sure to
give your
daytime phone
number

Area Code and Telephone Number ▶ 310-540-8832

7

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▼

- author
 other copyright claimant
 owner of exclusive right(s)
 authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made
by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▶ If this application gives a date of publication in space 3, do not sign and submit it before that date.

RICK ABELSON Date ▶ 11/6/98



Handwritten signature (X) ▶ J.P. Abelson

8

Mail
certificate to:

Certificate
will be
mailed in
window
envelope

Name ▶ RICK ABELSON
Number/Street/Apt ▶ 856 AVENUE B
City/State/ZIP ▶ REDONDO BEACH, CA. 90277

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 8
SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE:
1. Application form
2. Nonrefundable \$20 filing fee
in check or money order
payable to Register of Copyrights
3. Description of material
MAIL TO:
Register of Copyrights
Library of Congress
Washington, D.C. 20559-6000

9

*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

March 1995—300,000

PRINTED ON RECYCLED PAPER

U.S. GOVERNMENT PRINTING OFFICE: 1995-387-237/41

EXHIBIT B

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

REGISTER OF COPYRIGHTS
United States of America

FORM VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

RE:

VAU 431-021



EFFECTIVE DATE OF REGISTRATION

1 12 98
Month Day Year

1

TITLE OF THIS WORK ▼

THE WHEEL THEATRE -
TEAR APIN STATION

NATURE OF THIS WORK ▼ See instructions

'2D' SKETCH OF
THEATRE INTERIOR

PREVIOUS OR ALTERNATIVE TITLES ▼

THE GRATEFUL DEAD EXPERIENCE

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared.
Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

a

NAME OF AUTHOR ▼ RICK ABELSON DBA
LET IT SHINE PROJECTIONS)

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

1960

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ▶
Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

If the answer to either of these questions is "Yes," see detailed instructions.

Anonymous? Yes No
Pseudonymous? Yes No

NOTE

Under the law,
the "author" is

NATURE OF AUTHORSHIP Check appropriate box(es). See Instructions

- 3-Dimensional sculpture
- Map
- Technical drawing
- 2-Dimensional artwork
- Photograph
- Text
- Reproduction of work of art
- Jewelry design
- Architectural work
- Design on sheetlike material

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Vas this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR { Citizen of ▶
Domiciled in ▶

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Pseudonymous? Yes No

NATURE OF AUTHORSHIP Check appropriate box(es). See Instructions

- 3-Dimensional sculpture
- Map
- Technical drawing
- 2-Dimensional artwork
- Photograph
- Text
- Reproduction of work of art
- Jewelry design
- Architectural work
- Design on sheetlike material

3

a

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1997

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month ▶ Day ▶ Year ▶

◀ Nation

4

a

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

RICK ABELSON
856 AVENUE B
REDONDO BEACH, CA. 90277

APPLICATION RECEIVED

JAN 12 1998 JUN 19 1998

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

JAN 12 1998

FUNDS RECEIVED

See instructions
before completing
this space.

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

MORE ON BACK ▶ * Complete all applicable spaces (numbers 5-8) on the reverse side of this page

DO NOT WRITE HERE

EXAMINED BY <i>JL-A</i>	FORM VA
CHECKED BY <i>Dan H</i>	
<input checked="" type="checkbox"/> CORRESPONDENCE <input checked="" type="checkbox"/> Yes	FOR COPYRIGHT OFFICE USE ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

- a. This is the first published edition of a work previously registered in unpublished form.
b. This is the first application submitted by this author as copyright claimant.
c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

VAU 373-848 (JULY 29, 1996) + VA 807-684 (AUGUST 6, 1996)

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

*(1) THE GRATEFUL DEAD EXPERIENCE
(2) TERRAPIN STATION - CONCEPT DEVELOPMENT + FINANCIAL
OVERVIEW*

5

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

*MODERNIZING NEW SKETCH THAT SHOWS THE INTERIOR OF
THE WHEEL THEATRE I DESIGNED FOR COPYRIGHT VA - 807-684*

See instructions
before completing
this space.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

*RICK ABELSON
856 AVENUE B
REDONDO BEACH, CA 90277*

Be sure to
give your
daytime phone
number

Area Code and Telephone Number ▶ *310-540-8832*

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▼

- author
 other copyright claimant
 owner of exclusive right(s)
 authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made
by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

RICK ABELSON

Date ▶ *1-6-98*



Handwritten signature (X) ▼

RICK ABELSON

8

Mail
certificate
to:

Certificate
will be
mailed in
Window
envelope

Name ▼
RICK ABELSON
Number/Street/Apt ▼
856 AVENUE B
City/State/ZIP ▼
REDONDO BEACH, CA. 90277

• Complete all necessary spaces
• Sign your application in space 6
• Print clearly
• Use black ink
1. Application form
2. Nonrefundable \$20 filing fee
in check or money order
payable to Register of Copyrights
3. Deposit material
MAIL TO:
Register of Copyrights
Library of Congress
Washington, D.C. 20559-6000

9

*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

March 1995-900,000 PRINTED ON RECYCLED PAPER

★U.S. GOVERNMENT PRINTING OFFICE: 1995-387-237/41

EXHIBIT B

CERTIFICATE OF REGISTRATION



OFFICIAL SEAL

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

FORM VA
UNITED STATES COPYRIGHT OFFICE

VAU 373-848



EF. DATE OF REGISTRATION

JUL 29 1996

Month Day Year

Marybeth Peters

REGISTER OF COPYRIGHTS

NATURE OF THIS WORK ▼ See instructions

1

THE GRATEFUL DEAD EXPERIENCE MUSEUM DESIGN

PREVIOUS OR ALTERNATIVE TITLES ▼

N/A

PUBLICATION AS A CONTRIBUTION If this work was a contribution to a periodical, serial, or collection, give information about the publication.

N/A

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

HOK ABELSON

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

1960

NOTE

Under the law,



Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country USA
OR Citizen of ▶ Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼
TEXT AND ARTWORK (DIAGRAMS)

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

NAME OF AUTHOR ▼

N/A

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country USA
OR Citizen of ▶ Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

NAME OF AUTHOR ▼

N/A

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country USA
OR Citizen of ▶ Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases.
1995 ▶ Year

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information Month ▶ Day ▶ Year ▶ Nation ▶
ONLY if this work has been published.

N/A

4

See instructions before completing this space.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

HOK ABELSON (UNIT B)
16 SOUTH GUADALUPE AVENUE
REDONDO BEACH, CALIFORNIA 90277

APPLICATION RECEIVED

JUL 29 1996

ONE DEPOSIT RECEIVED

JUL 29 1996

TWO DEPOSITS RECEIVED

DO NOT WRITE HERE
OFFICE USE ONLY

REMITTANCE NUMBER AND DATE

MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
• See detailed instructions.
• Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of _____ pages

EXHIBIT B

EXAMINED BY *[Signature]* FORM VA

CHECKED BY _____

CORRESPONDENCE
Yes

DEPOSIT ACCOUNT
FUND'S USED

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
 This is the first published edition of a work previously registered in unpublished form.
 This is the first application submitted by this author as copyright claimant.
 This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

- a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

6

- b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

N/A

See instructions
before completing
this space.

DEPOSIT ACCOUNT If the registration fees is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

7

N/A

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

RICK ABELSON
106 SOUTH GUADALUPE AVENUE (UNIT B)
REDONDO BEACH, CALIFORNIA 90277

Be sure to
give your
daytime phone
number.

Area Code & Telephone Number ▶ 310-379-1894

8

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ▼

author

other copyright claimant

owner of exclusive right(s)

authorized agent of

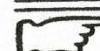
Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made
by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this is a published work, this date must be the same as or later than the date of publication given in space 3.

RICK ABELSON

Date ▶ 7/23/96



Handwritten signature (D) ▼

9

MAIL
CERTIFI-
CATE TO
Certificate
will be
mailed in
window
envelope

Name ▼ RICK ABELSON

Number/Street/Apartment Number ▼ 106 SOUTH GUADALUPE AVENUE (UNIT 'B')

City/State/ZIP ▼ REDONDO BEACH, CALIFORNIA 90277

- Have you:
- Completed all necessary spaces?
 - Signed your application in space 6?
 - Enclosed a check or money order for \$10 payable to Register of Copyrights?
 - Enclosed your deposit material with the application and fee?
- MAIL TO: Register of Copyrights,
Library of Congress, Washington,
D.C. 20559

* 17 U.S.C. § 505(e). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 403, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

* U.S. GOVERNMENT PRINTING OFFICE: 1987: 181-53148-018

February 1987—100,000

EXHIBIT B

EXHIBIT C

EXHIBIT C

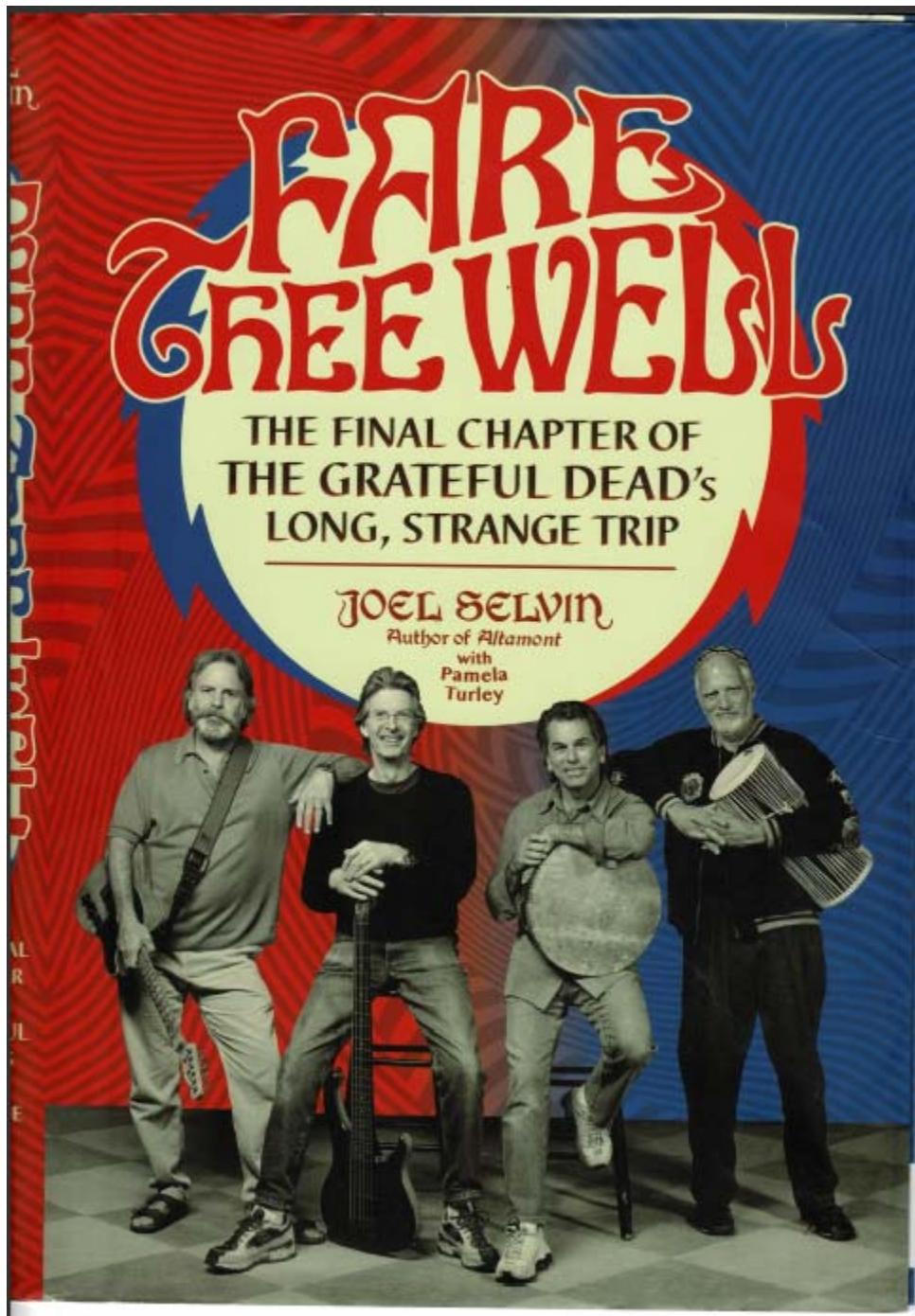
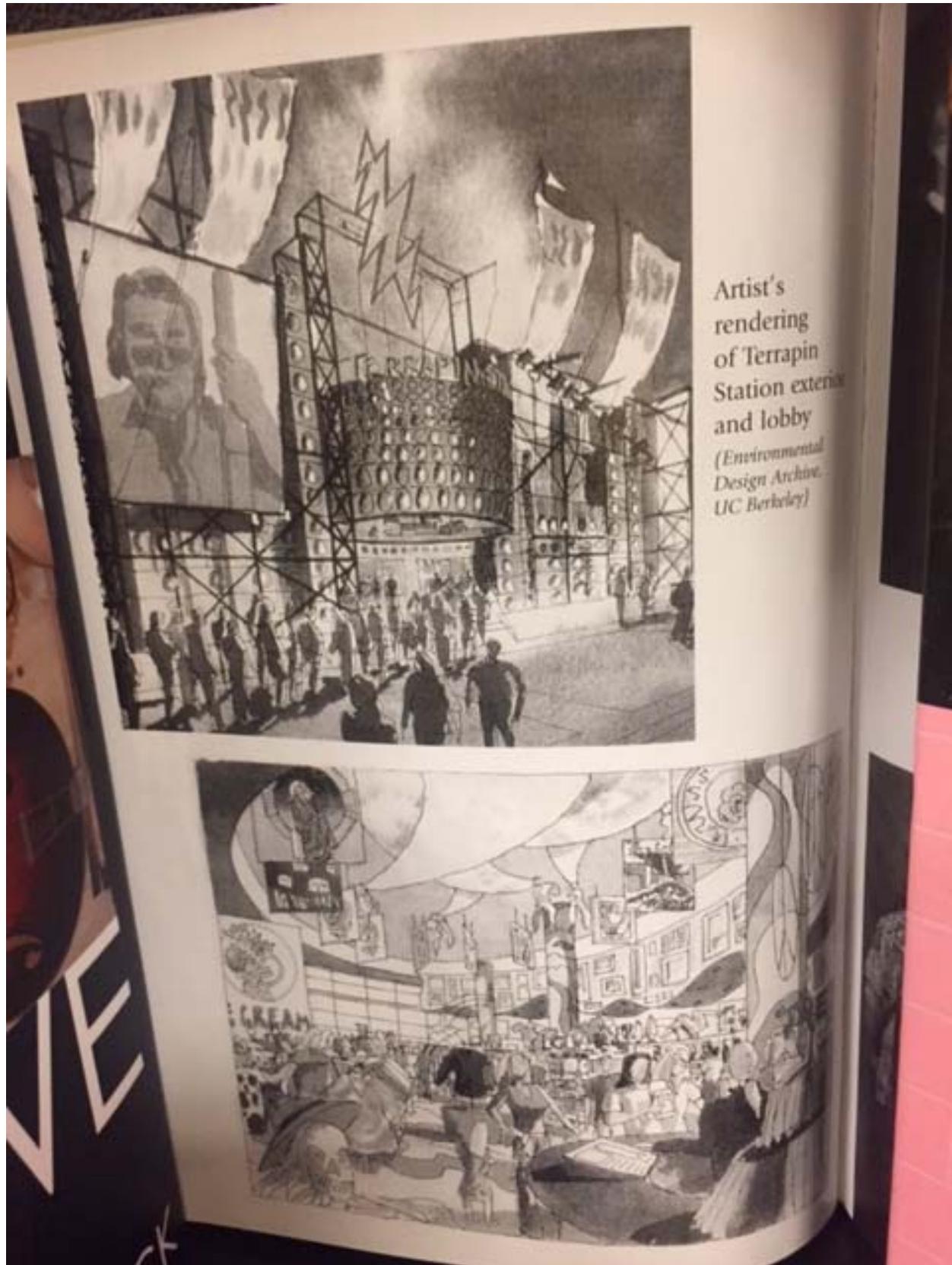


EXHIBIT C



FARE THEE WELL

30

played around the world. The Truckin' room would feature a timeline of the band's career illustrated with memorabilia such as Pigpen's organ or Garcia's Uncle Sam hat. The Other One, the final themed room, would reflect the colorful parking lot scene of Dead concerts.

Plans called for a building with fifty thousand square feet, the size of a large supermarket, and the average visitor experience was reckoned to last three hours.

Imagine giving young music fans, as well as long-time Deadheads, the opportunity to "touch the Grateful Dead," to pass through the rich history of the music and its tangents by presenting a fascinating and incisive panorama of the Grateful Dead with the use of authentic memorabilia and state-of-the-art media.

It will be a mystical place to invigorate the senses. Something to capture the tried and true, as well as the curious imagination. Terrapin Station will be the most unique educational and spiritual music attraction ever assemble [sic] in America.

Abelson made the prospect look possible, even relatively routine, and eminently doable. He estimated planning and construction could be completed in under thirty-six months. There was talk of a reunion concert at the place on New Year's Eve 1999.

EXHIBIT D

EXHIBIT D

From: Joelsonvin <joelsonvin@aol.com>
Sent: Monday, October 09, 2017 12:18 PM
To: Rick
Subject: Re: Terrapin Station

Hi Rick -

Finished the book. Comes out in June 2018. Wanted to use pix of Terrapin Station in insert and went through the Cathy Simon papers at Cal. They photographed some models and plans for me, but I would much rather use one of your watercolors. Do you have any renderings I could clear? The models are so dry and character-less. Your drawings in the books were vital and full of life and color.

Cheers to you.

js

Sent from my iPad